

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CLAUDE LEWIS,

Plaintiff,

Civ. No.: 14-CV-2302 (CRK)

AMERICAN SUGAR REFINING, INC.,
and MEHANDRA RAMPHAL,

VERDICT SHEET

Defendants.

The jury unanimously makes the following findings:

DISCRIMINATION -- LIABILITY

1. Has Mr. Lewis proven by a preponderance of the evidence, that American Sugar Refining, Inc. discriminated against him on the basis of his race and/or national origin in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

2. Has Mr. Lewis proven by a preponderance of the evidence, that Mehendra Ramphal discriminated against him on the basis of his race and/or national origin in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answer "YES" to Question 1 and/or Question 2, then you must answer Questions 3, 4 and 5. If you answered "NO" to BOTH Questions 1 and 2, then you should skip Questions 3, 4 and 5 and proceed to Question 6.

DISCRIMINATION -- ACTUAL DAMAGES

3. Has Mr. Lewis proven, by a preponderance of the evidence, that he has suffered actual damages because of American Sugar Refining, Inc.'s and/or Mahendra Ramphal's discrimination in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answered "YES" to Question 3, state below the amount that is awarded to compensate him for his injuries:

\$ _____

DISCRIMINATION -- COMPENSATORY DAMAGES

4. Has Mr. Lewis proven, by a preponderance of the evidence, that he has suffered emotional distress, pain and suffering because of American Sugars Holding, Inc.'s and/or Mahendra Ramphal's discrimination in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answered "YES" to Question 4, state below the amount that is awarded to compensate him for his injuries:

\$ _____

DISCRIMINATION -- PUNITIVE DAMAGES

5. Has Mr. Lewis proven, by a preponderance of the evidence, that he is entitled to an award of punitive damages against American Sugars Holding, Inc. and/or Mahendra Ramphal because of their discrimination under Title VII of the Civil Rights Act of 1964?

YES _____ NO _____

If you answered "YES" to Question 5, state the amount to be awarded as punitive damages:

\$ _____

HOSTILE WORK ENVIRONMENT -- LIABILITY

6. Has Mr. Lewis proven by a preponderance of the evidence, that American Sugar Refining, Inc. subjected Mr. Lewis to a hostile work environment because of his race and/or national origin in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

7. Has Mr. Lewis proven by a preponderance of the evidence, that Mehandra Ramphal subjected Mr. Lewis to a hostile work environment because of his race and/or national origin in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answer "YES" to Question 6 and/or Question 7, then you must answer Questions 8, 9 and 10. If you answered "NO" to BOTH Questions 6 and 7, then you should skip Questions 8, 9 and 10 and proceed to Question 11.

HOSTILE WORK ENVIRONMENT -- ACTUAL DAMAGES

8. Has Mr. Lewis proven, by a preponderance of the evidence, that he has suffered actual damages because of American Sugar Refining, Inc.'s and/or Mahendra Ramphal's hostile work environment in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answered "YES" to Question 8, state below the amount that is awarded to compensate him for his injuries:

\$ _____

HOSTILE WORK ENVIRONMENT -- COMPENSATORY DAMAGES

9. Has Mr. Lewis proven, by a preponderance of the evidence, that he has suffered emotional distress, pain and suffering because of American Sugars Holding, Inc.'s and/or Mahendra Ramphal's hostile work environment in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answered "YES" to Question 9, state below the amount that is awarded to compensate him for his injuries:

\$ _____

HOSTILE WORK ENVIRONMENT -- PUNITIVE DAMAGES

10. Has Mr. Lewis proven, by a preponderance of the evidence, that he is entitled to an award of punitive damages against American Sugars Holding, Inc. and/or Mahendra Ramphal because of the hostile work environment under Title VII of the Civil Rights Act of 1964?

YES _____ NO _____

If you answered "YES" to Question 10, state the amount to be awarded as punitive damages:

\$ _____

RETALIATION -- LIABILITY

11. Has Mr. Lewis proven by a preponderance of the evidence, that American Sugar Refining, Inc. retaliated against Mr. Lewis in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

12. Has Mr. Lewis proven by a preponderance of the evidence, that Mahendra Ramphal retaliated against Mr. Lewis in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answer "YES" to Question 11 and/or Question 12, then you must answer Questions 13, 14 and 15. If you answered "NO" to BOTH Questions 11 and 12, then your deliberations are at an end, and the foreperson should sign and date the verdict sheet, place it in an envelope, and inform the Marshall that the jury has reached a verdict.

RETALIATION -- ACTUAL DAMAGES

13. Has Mr. Lewis proven, by a preponderance of the evidence, that he has suffered actual damages because of American Sugar Refining, Inc.'s and/or Mahendra Ramphal's retaliation in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answered "YES" to Question 13, state below the amount that is awarded to compensate him for his injuries:

\$ _____

RETALIATION -- COMPENSATORY DAMAGES

14. Has Mr. Lewis proven, by a preponderance of the evidence, that he has suffered emotional distress, pain and suffering because of American Sugars Holding, Inc.'s and/or Mahendra Ramphal's retaliation in violation of Title VII of the Civil Rights Act of 1964 and the New York State Human Rights Law?

YES _____ NO _____

If you answered "YES" to Question 14, state below the amount that is awarded to compensate him for his injuries:

\$ _____

RETALIATION -- PUNITIVE DAMAGES

15. Has Mr. Lewis proven, by a preponderance of the evidence, that he is entitled to an award of punitive damages against American Sugars Holding, Inc. and/or Mahendra Ramphal because of the retaliation under Title VII of the Civil Rights Act of 1964?

YES _____ NO _____

If you answered "YES" to Question 15, state the amount to be awarded as punitive damages:

\$ _____

You have completed your deliberations. After completing this form, the Foreperson should sign and date it, place it in an envelope, and inform the Marshal that the jury has reached a verdict.

Dated: _____ _____
Signature of Foreperson